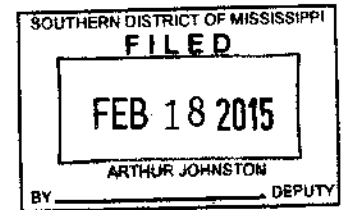


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:15-cr-12LG-RHW

CARLOS MILLER,
JULIE MICHELLE GLASS, and
RANDALL SHEFFIELD

21 U.S.C. § 846
18 U.S.C. § 924(o)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 922(g)(1)

The Grand Jury charges:

COUNT 1

That beginning sometime in November 2014 and continuing up to the date of this Indictment, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **CARLOS MILLER, JULIE MICHELLE GLASS and RANDALL SHEFFIELD**, did knowingly and willfully conspire with each other and with others both known and unknown to the Grand Jury, to possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance, and a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

**QUANTITY OF HEROIN AND COCAINE HYDROCHLORIDE INVOLVED
IN THE CONSPIRACY**

With respect to **CARLOS MILLER**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1 kilogram or more of a mixture or substance containing a detectable amount of heroin

and 500 grams or more of cocaine hydrochloride in violation of Section 841(b)(1)(A) & (B), Title 21, United States Code.

With respect to **JULIE MICHELLE GLASS**, the amount involved in the conspiracy attributable to her as a result of her conduct, and the conduct of other conspirators reasonably foreseeable to her, is 1 kilogram or more of a mixture or substance containing a detectable amount of heroin and 500 grams or more of cocaine hydrochloride in violation of Section 841(b)(1)(A) & (B), Title 21, United States Code.

With respect to **RANDALL SHEFFIELD**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1 kilogram or more of a mixture or substance containing a detectable amount of heroin and 500 grams or more of cocaine hydrochloride in violation of Section 841(b)(1)(A) & (B), Title 21, United States Code.

COUNT 2

That on or about January 23, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **CARLOS MILLER, JULIE MICHELLE GLASS and RANDALL SHEFFIELD**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to possess with intent to distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance in violation of Section 846, Title 21, United States Code and Section 2, Title 18, United States Code.

COUNT 3

That on or about January 23, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **CARLOS MILLER, JULIE**

MICHELLE GLASS and RANDALL SHEFFIELD, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to possess with intent to distribute 500 grams or more of a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance in violation of Section 846, Title 21, United States Code and Section 2, Title 18, United States Code.

COUNT 4

On or about January 23, 2015, in Harrison County in the Southern Division of the Southern District of Mississippi, the defendants **JULIE MICHELLE GLASS and RANDALL SHEFFIELD**, did knowingly conspire with each other and with other persons known and unknown to the Grand Jury, to use and carry firearms during and in relation to a drug trafficking crime, and possess firearms in furtherance of the drug trafficking crime, to wit: a conspiracy to possess with the intent to distribute heroin and cocaine hydrochloride, drug controlled substances.

All in violation of Section 924(o), Title 18, United States Code.

COUNT 5

On or about January 23, 2015, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **JULIE MICHELLE GLASS and RANDALL SHEFFIELD**, did knowingly carry and use a firearm during and in relation to a drug trafficking crime, and possess a firearm in furtherance of a drug trafficking crime, for which they may be prosecuted in a court of the United States, that is, possession with intent to distribute heroin and cocaine hydrochloride as prohibited by Section 841, Title 21, United States Code.

In violation of Sections 924(c)(1)(A) and 2, Title 18, United States Code.

COUNT 6

On or about January 23, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **RANDALL SHEFFIELD**, having been convicted previously of a felony, that is, a crime which is punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm which had previously been shipped and transported in and affecting interstate commerce.

In violation of Sections 922(g)(1) and 924(a)(2), Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

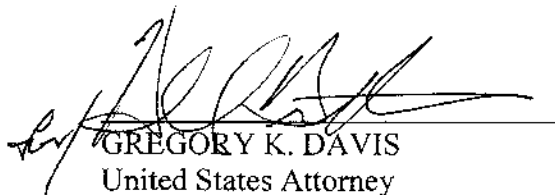
The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of the offense alleged in the Indictment:

- (1) Masterpiece Arms "Uzi Style" 9mm Assault Rifle; SN: F2436;
- (2) Smith & Wesson Model SW9VE, 9mm pistol; SN: PDH8239;
- (3) Strum Ruger .357 Revolver; SN: 151-3870;
- (4) Lorcin Model L25, .25 caliber pistol; SN: 024541; and
- (5) Any and all ammunition.

Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property,

which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

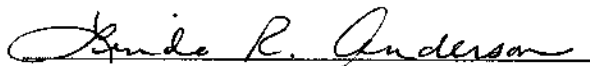
All pursuant to Section 924(d)(1), Title 18, United States Code, Section 853, Title 21, United States Code, Section 2641(c), Title 28, United States Code and Section 981(a)(1)(c), Title 18, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL
s/signature redacted

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 18th day of February, 2015.


UNITED STATES MAGISTRATE JUDGE